Excerpts of Written Notes taken by Reporter Karen Garloch during 12/10/90 interview with Respondent Jack L. Crain regarding Dr. George Gaunt.

(From Appellate Record, Ep. 011453)

Crain 12-10-90

* * *

not very emotionally sound

dead cat - noose around its neck

letters to neighbors - child molester

been to police 86
This man is nuts
Now, I don't know what he does now -
police -
complaint on file

airport - totally glued shut -
daughter - card - man in tower
w/noose around neck
stick on letters -

its all died down -
he can still survive without me -

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cont' next page

Excerpts of Written Notes taken by Reporter Karen Garloch during 12/10/90 interview with Respondent Jack L. Crain regarding Dr. George Gaunt con't.

(From Appellate Record, Ep. 011453)

Dick & Gaunt - in 83 -
George's credentials -
incredible how he
engineered the system
to be open
had I known - I wouldn't be in Charlotte

* * *

he had run the Mercy Hospital regular
clinical lab -
never mentioned that he never
graduated -
been to Yale
been to Mayo -

* * *

Excerpts from Deposition of Respondent Jack L. Crain

(Appellate Rp. 266)

CRAIN 498

Q. Did you ever tell Karen Garloch that Dr. Gaunt was engaging in any criminal activity?

A. I don't know how to answer that question. I know of no accused criminal activity that has occurred.

Q. Did you ever tell her that Dr. Gaunt was engaging in any criminal activity?

(WHEREUPON, the witness conferred with Mr. Hewson off the record.)

MR. BATCHELER: The witness is conferring with his counsel.

MR. HEWSON: Yes. He says he doesn't know how to answer that.

MR. BATCHELER: He can answer yes or no. That would be one way or two ways.

MR. HEWSON: Well, thank you for that logical contribution to our -

THE WITNESS: Deliberations

MR. HEWSON: - human experience.

Excerpts from Deposition of Respondent Jack L. Crain

(Appellate Rp. 266)

CRAIN 498 cont'

Q. The question was did you tell Karen Garloch that Dr. Gaunt was engaging in any criminal activity?

A. After I left Dr. Gaunt's facility there were things that happened in my family's life that made me concerned that there may be some steps beyond the bounds of what's legal.

Excerpts from Deposition of Respondent Jack L. Crain

(Appellate Rp. 266)

CRAIN 499

Q. Did you tell Karen Garloch that Dr. Gaunt was engaged in any criminal activity?

A. I don't know the answer to that.

Q. You don't recall whether you did or not?

A. I don't know.

Q. Did you tell Karen Garloch that Dr. Gaunt at the Center for Reproductive Medicine committed any insurance fraud?

A. I don't think so. I don't believe her newspaper article said that, did it?

Q. I'm just asking whether you ever told her such a thing.

A. No.

* * *

Excerpts from Deposition of Reporter Karen Garloch

(Appellate Rp. 266; Ep. 1049)

GARLOCH 336

A. You've seen in my notes that Dr. Crain had heard that [Dr. Gaunt] had been kicked out. I'm sure - - I don't know - I think I probably addressed that with Dr. Gaunt. I think that - - I mean, I didn't ever find that that was true.

Q. Did you try to find out whether it was true?

A. I did by calling the Mayo and talking to Dr. Gaunt. I never found that that was true.

* * *

Excerpts from Deposition of Reporter Karen Garloch

(Appellate Rp. 266; Ep. 1705)

GARLOCH 838-839

Q. Did you ever have any telephone conversations with Dr. Crain?

A. Yes.

Q. Looking on page CO 01112, I see the words didn't - and you tell me whether I'm reading them properly, would you? Didn't do anything after med school, kicked out of path residency in Mayo, is that a fair reflection of what you wrote?

A. Yes.

Q. Did Dr. Crain tell you that Dr. Gaunt had not done anything after medical school and had been kicked out of pathology residency at the Mayo Clinic?

A. My notes speak for themselves. That was our conversation.

* * *

Q. The second line from the bottom, it says he's cheating people. Did Dr. Crain tell you that Dr. Gaunt was cheating people?

A. That's what my notes say.

Excerpts from Deposition of Reporter Karen Garloch

(Appellate Rp. 266; Ep. 1049)

GARLOCH 844-845

* * *

Q. About two inches further down on the page there's a line which I'll read.

"He's the Jim Bakker of medicine."

"the guy is an absolute crim. . ."

Did Dr. Crain tell you that Dr. Gaunt was the Jim Bakker of medicine?

A. Yes.

Q. What did you understand he meant by that?

A. I don't know if I had an understanding further than what this says.

Q. Is Jim Bakker known for any particular characteristic in this town?

A. Jim Bakker used to be a religious leader in this town.

Q. Was Dr. Crain saying that Dr. Gaunt was the religious leader of medicine?

A. No. I don't know what he was saying.

Excerpts from Deposition of Reporter Karen Garloch

(Appellate Rp. 266; Ep. 1049)

GARLOCH 844-845 cont'

Q. Was Jim Bakker known for anything else in this town?

A. He's known for a lot of things. I don't know which one you want me to say.

Q. When somebody would call somebody the Jim Bakker of medicine, what do you understand by that?

MR. BUCHAN: I'm going to object to that. She's answered the question.

A. I didn't have a real good understanding of what he meant.

Q. Would it be a complimentary term to be the Jim Bakker of medicine or a derogatory term or a neutral term?

A. I don't think it would be complimentary.

Q. Would it be derogatory?

A. Yeah.

Excerpt from Affidavit of Karen Garloch

(Affidavit Rp. 276, Ep. 11223)

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* * *

26. In that conversation, Dr. Crain also told me that he understood Dr. Richard Wing and Dr. Daniel Whitesides had each treated former patients of Dr. Gaunt and CRM. He said Dr. Wing and Dr. Whitesides had informed him in each case that they believed Dr. Gaunt and CRM had failed to properly diagnose significant medical problems. Dr. Wing's case involved a large endometrioma, and Dr. Whitesides' case involved a large tumor, Dr. Crain told me. Dr. Crain said that while he was employed at CRM, Dr. Gaunt had often held him out to patients to be the person who made "clinical decisions" regarding patient care because Dr. Crain was a gynecologist with additional training in reproductive endocrinology. But in reality, Dr. Crain said, it was Dr. Gaunt who made most of the clinical decisions regarding patient care, testing and diagnosis of

Excerpt from Affidavit of Karen Garloch Cont'

(Affidavit Rp. 276, Ep. 11223)

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infertility and treatment options. Dr. Crain raised serious questions about Dr. Gaunt's honesty and about the quality of care Dr. Gaunt provided. Because Dr. Crain had actually worked at CRM for two years and had witnessed Dr. Gaunt's medical practice firsthand, he appeared to be a credible observer of CRM and Dr. Gaunt. I also knew, based on my three years of experience as *The Charlotte Observer's* medical reporter, that Dr. Crain, Dr. Wing and Dr. Whitesides were physicians who were well respected by their peers in the Charlotte medical community.

(Appellate Rp. 270)

(This Exhibit is listed as Exhibit No. 48 at App. E, p. 39a of the Petition)

CAROLINA
PR/Marketing
Carolina Public Relations/Marketing, Inc.
908 South Tryon Street, Suite 2200
Charlotte, North Carolina 28202
704/332-2030 * FAX 704/332-2945

I N V O I C E

#3392

February 28, 1990

Dr. George Gaunt
Center for Reproductive Medicine
2034 Randolph Road
Charlotte, NC 28207

For Professional Services during the Month of February, 1990: $960.00

For planning, research, counsel and media contact to publicize arrival of Cambodian triplets, including production of media release rough.

For Reimbursable Expenses:

Clerical services	$105.00
Copies	3.00

(continued to next page)

(Appellate Rp. 270)

(This Exhibit is listed as Exhibit No. 48 at App. E, p. 39a of the Petition)

Postage	1.20	
Telephone	7.00	116.20
TOTAL AMOUNT DUE:		$1,076.20

Ep. 0009452

(Appellate Rp. 270)

(This Exhibit is listed as Exhibit No. 50 at App. E, p. 40a of the Petition)

CAROLINA
PR/Marketing
Carolina Public Relations/Marketing, Inc.

908 South Tryon Street, Suite 2200
Charlotte, North Carolina 28202
704/332-2030 * FAX 704/332-2945

I N V O I C E

#3484

April 30, 1990

Dr. George Gaunt
Center for Reproductive Medicine
2034 Randolph Road
Charlotte, NC 28207

For research, development of primary media rough, research with National Chestnut Foundation, and discussions with management, real estate agent, and research in special real estate interests relevant to historic properties. $1,500.00

Clerical services	$15.00
Copies	.80

(continued to next page)

(Appellate Rp. 270)

(This Exhibit is listed as Exhibit No. 50 at App. E, p. 40a of the Petition)

Postage	.25	16.05
TOTAL AMOUNT DUE:		$1,516.05

/ep

Ep. 009454

Press Release

(Appellate Rp. 268)

(This Exhibit is listed as Exhibit No. 14 at App. E, p. 36a of the Petition)

(Symbol) Center For Reproductive Medicine
2034 Randolph Road, Charlotte, NC 28207

MEDIA CONFERENCE ANNOUNCEMENT

WHAT?	A media conference to announce the birth of a child to a Waxhaw woman who had been voluntarily sterilized.
WHEN?	Wednesday, March 15, at 2 P.M.
WHERE?	At the third floor offices of The Center For Reproductive Medicine at 2034 Randolph Road in Charlotte, N.C.
WHY?	To let women who have been sterilized via tubal ligation (tied tubes) know that in many cases childbirth is possible in the event they change their minds (this is true in many cases, particularly when the woman remarries).
HOW?	Using IVF procedures (in-vitro fertilization) and the new, ultrasound technique.

(continued to next page)

Press Release

(Appellate Rp. 268)

(This Exhibit is listed as Exhibit No. 14 at App. E, p. 36a of the Petition)

SPECIAL ANGLE:

The couple makes its living in the poultry and livestock breeding business. They were able to finance the relatively costly procedure through the sale of prize breeding bulls.

NOTE: Testing, fertilization, patient care, and birth all took place in Mecklenburg County. The child, a boy, weighed over nine pounds and is in perfect health. The birth is the fifth IVF success for the clinic in the past 10 months.

For additional information, contact: Bill Ballenger
(704) 332-2030

Advertisement

(Appellate Rp. 269)

(This Exhibit is listed as Exhibit No. 29 at App. E, p. 38a of the Petition)

In Recognition of
NATIONAL INFERTILITY AWARENESS WEEK

THE CENTER FOR REPRODUCTIVE MEDICINE
Reaffirms
The Commitment to Excellence in The Resolution of Infertility

The Center for Reproductive Medicine provides a unique concept in the care of infertile couples. Our team of doctors, nurses, scientists, and psychologists is devoted exclusively to couple oriented infertility care with an emphasis on patient education and the emotional aspects of infertility. We have Charlotte's only successful comprehensive *in vitro* fertilization program and full-service infertility laboratory that is accredited by the College of American Pathologists. If you would like information to help you understand recent technological advances in infertility, please feel free to call us for information, care or referral.

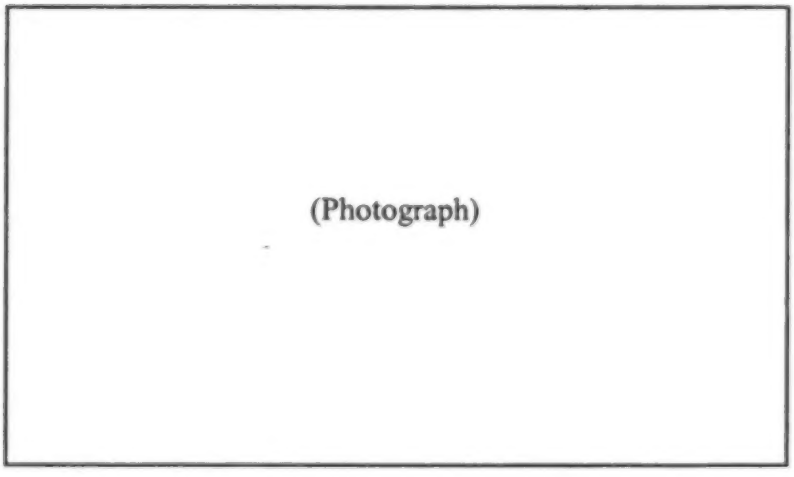
(The Center For Reporductive Medicine symbol)

2034 Randolph Road • Charlotte, NC 28207 • (704) 372-4600 • 1-800-843-6098

Photograph and Caption of Dr. George Gaunt, Barbara Fielding and Nursing Dean Nancy Langston in Winter, 1986 Edition of the University of North Carolina's Charlotte News

(Appellate Rp. 267)

(This Exhibit is listed as Exhibit 5 at App. E, p. 35a of the Petition)



Scholarship Funds For Nursing

Dr. George Gaunt (center) presents College of Nursing Dean Nancy Langston with a check from the Charlotte Center for Reproductive Medicine. At right is Barbara Fielding, also of the Center. The contribution will provide $300 in scholarship funds for a nursing student each semester.